

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO

RECEIVED

MAR 14 2016

Jeremy P. Gogolak & Laurence Little
(ENTER ABOVE THE NAME OF THE PLAINTIFF IN THIS ACTION)

ET AL
- PLAINTIFFS -
IF THE PLAINTIFF IS A PRISONER: PRISONER # 624-283
599-448
VS.

Mr. Oldren
(ENTER ABOVE THE NAME OF THE DEFENDANT IN THIS ACTION)

RICHARD W. NAGEL
Clerk Of Court
CINCINNATI, OHIO

16-383

SJD - KLL

IF THERE ARE ADDITIONAL DEFENDANTS PLEASE LIST THEM:

Mr. Cool
Mr. Cadogan
Mr. Chapman
John / Jane Does x 10

COMPLAINT

I. PARTIES TO THE ACTION:

PLAINTIFF: PLACE YOUR NAME AND ADDRESS ON THE LINES BELOW. THE ADDRESS YOU GIVE MUST BE THE ADDRESS THAT THE COURT MAY CONTACT YOU AND MAIL DOCUMENTS TO YOU. A TELEPHONE NUMBER IS REQUIRED.

Jeremy P. Gogolak
NAME - FULL NAME PLEASE - PRINT

S.O.C.F. P.O. Box 25699
ADDRESS: STREET, CITY, STATE AND ZIP CODE

LUCASVILLE, OH, 25699

TELEPHONE NUMBER

IF THERE ARE ADDITIONAL PLAINTIFFS IN THIS SUIT, A SEPARATE PIECE OF PAPER SHOULD BE ATTACHED IMMEDIATELY BEHIND THIS PAGE WITH THEIR FULL NAMES, ADDRESSES AND TELEPHONE NUMBERS. IF NO ADDITIONAL PLAINTIFFS EXIST CONTINUE WITH THIS FORM.

PAGE 2 AND 3 OF THIS FORM DEAL ONLY WITH A PLAINTIFF THAT IS INCARCERATED AT THE TIME OF FILING THIS COMPLAINT.

IF YOU ARE A PRISONER FILING A CIVIL SUIT THE FOLLOWING INFORMATION IS REQUIRED:

PREVIOUS LAWSUITS:

- A. HAVE YOU BEGUN OTHER LAWSUITS IN STATE OR FEDERAL COURT DEALING WITH THE SAME FACTS INVOLVED IN THIS ACTION OR OTHERWISE RELATING TO YOUR IMPRISONMENT? YES () NO ()
- B. IF YOUR ANSWER TO A IS YES, DESCRIBE THE LAWSUIT IN THE SPACE BELOW. (IF THERE IS MORE THAN ONE LAWSUIT, DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THE SAME OUTLINE.)
 1. PARTIES TO THIS PREVIOUS LAWSUIT

PLAINTIFFS:

Jeremy P. Gallant

DEFENDANTS:

Faisal Ahmed

Mr. Hawkins - Mrs. Clagg

Mona Parks

2. COURT (IF FEDERAL COURT, NAME THE DISTRICT; IF STATE COURT, NAME THE COUNTY)

This Court -

3. DOCKET NUMBER

Case 0:07-cv-099 -

4. NAME OF THE JUDGE TO WHOM THE CASE WAS ASSIGNED

Court Judge Deott

5. DISPOSITION (FOR EXAMPLE, WAS THE CASE DISMISSED? WAS IT APPEALED? IS IT STILL PENDING?)

Pending

6. APPROXIMATE DATE OF THE FILING OF THE LAWSUIT

March, 2014

7. APPROXIMATE DATE OF THE DISPOSITION

- Pending -

United States District Courts
Southern District of Ohio
Western Division

LISTED PLAINTIFFS TO BE:

1.)	JEREMY P. GALLANT	- NO. 624-283
2.)	LAWRENCE LITTLE	- NO. 599-2128
3.)	STEVEN RAINES	- NO. 582-055
4.)	LUCAS RUCKDOCK	- NO. 612-348
5.)	GREGORY DICKENS	- NO. 287-726
6.)	TREVNAUN THUNDER	- NO. 645-052
7.)	WAITER PARK	- NO. 564-082
8.)	DENVER S. MAYLE	- NO. 650-040
9.)	EDWARD E. HAMPTON	- NO. 599-334
10.)	DERRICK THOMAS III	- NO. 555-112
11.)	JEROME A.C. DUFFEY	- NO. 642-094
12.)	MARIO SYDOR	- NO. 627-917
13.)	BUSTER JOHNSON	- NO. 371-257
14.)	DARYLE LOGAN	- NO. 532-750
15.)	DOOSOB (revised)	- NO. 714-541
16.)	ISAAC NASH	- NO. 550-884
17.)	CHRIS BRADEN	- NO. 659-178
18.)	MARVIN DEARING	- NO. 211-030
19.)	CLAYTON JOHNSON	- NO. 668-803
20.)	LARRY FULLFORD	- NO. 253-243
21.)	PERRY BUCC	- NO. 689-418
22.)	REGINALD WILMORE	- NO. 524-963
23.)	HAROLD A.C. GRAPTH	- NO. 645-622
24.)	KENNETH PUCKETT	- NO. 600-765
25.)	TONY DOE X 2/0 -	2/0 INDIVIDUAL PARTIES

911 LISTED PARTIES ARE INVOLVED PERSONS TO
 THE CIVIL ASSERTIONS BROUGHT BEFORE THE
 HONORABLE COURTS. 911 PLAINTIFFS LISTED
 WITHIN SHARE THE SAME ADDRESS FOR SERVICE:
 SOUTHERN OHIO CORRECTIONAL FACILITY
 P.O. BOX 45699
 LUCASVILLE, OH, 45699.

PLAINTIFF - PETITIONER JEREMY P.
 GALLANT, RESPECTFULLY REQUESTS THE HONORABLE
 COURTS HOLD 911 LISTED PARTIES WITHIN
 OFS PLAINTIFFS IN THE CURRENT CIVIL
 AFFAIRS FOR JUST CAUSE AND ENTITLED RELIEF.
 PLEASE RESPECTFULLY SUBMITTED: Lawrence Little,
 Frank you

Jeremy P. Gallant
 NO. 624-283-S.O.C.F.
 P.O. Box 45699
 LUCASVILLE, OH, 45699

- OHIO PRISONERS UNITED -

PLACE OF PRESENT CONFINEMENT

A. IS THERE A PRISONER GRIEVANCE PROCEDURE IN THIS INSTITUTION?
YES () NO ()

B. DID YOU PRESENT THE FACTS RELATING TO YOUR COMPLAINT IN THIS STATE PRISONER GRIEVANCE PROCEDURE? YES () NO ()

C. IF YOUR ANSWER IS YES:

1. WHAT STEPS DID YOU TAKE?

STEP 1 = Informal Complaint

STEP 2 = Notification Grievance

STEP 3 = Appeal

2. WHAT WAS THE RESULT?

ABSOLUTELY NO ACTION WAS

TAKEN -

D. IF YOUR ANSWER IS NO, EXPLAIN WHY NOT.

* NOTE * Some Plaintiffs were denied utilizations while others are unable to intelligently utilize -

E. IF THERE IS NO PRISON GRIEVANCE PROCEDURE IN THIS INSTITUTION, DID YOU COMPLAIN TO PRISON AUTHORITIES? YES () NO ()

F. IF YOUR ANSWER IS YES:

1. WHAT STEPS DID YOU TAKE?

NOTIFIED responsible

STATE OFFICIALS -

2. WHAT WAS THE RESULT?

nothing

DEFENDANTS:

PLACE THE NAME AND ADDRESS OF EACH DEFENDANT YOU LISTED IN THE CAPTION ON THE FIRST PAGE OF THIS COMPLAINT. THIS FORM IS INVALID UNLESS EACH DEFENDANT APPEARS WITH FULL ADDRESS FOR PROPER SERVICE.

1. Opr. Holdren - S.O.C.F.

NAMES - FULL NAME PLEASE

P.O. Box 25699 LUCASVILLE, OH

ADDRESS - STREET, CITY, STATE AND ZIP CODE

2. Opr. Cool - P.O. Box 25699

LUCASVILLE, OH, 25699

3. Opr. Cadogan - P.O. Box 25699

LUCASVILLE, OH, 25699

4. O/S. OAH/IMAN - P.O. Box 25699

LUCASVILLE, OH, 25699

5. Jon/Jane Does x 10 -

P.O. Box 25699 - LUCASVILLE, OH, 25699

6. _____

IF THERE ARE ADDITIONAL DEFENDANTS, PLEASE CONTINUE LISTING THEM.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO 06
-WESTERN DIVISION-

Jeremy P. Gallant & Lawrence Little - APRIL 1, 3rd, 2016
No. 627-283- S.B.C.F. Scioto County, OH
P.O. Box 215699
Lucasville, OH, 215699

- apr holdren -
et al
DEFENDANTS-

CIVIL COMPLAINT ASSERTIONS
MONETARY/INJUNCTION RELIEF
CLASS ACTION CERTIFICATION

RESPECTFULLY:

I. NOW COMES PLAINTIFF-PETITIONER
Jeremy P. Gallant, pro-se, REQUESTING TO PROCEED
IN FORMA-PAUPERIS IN A CERTIFIED CLASS ACTION
COMPLAINT...

II. PLAINTIFF BRINGS THIS CIVIL COMPLAINT
ON BEHALF OF A CLASS OF PRISONERS PURSUANT TO
28 U.S.C. § 1783. THE HONORABLE COURTS MAINTAIN
JURISDICTION UNDER 28 U.S.C. §§ 1331 & 1333. PLAINTIFF
ALSO SEEKS A DECLARATORY-DECLARATORY JUDGEMENT PURSUANT
TO 28 U.S.C. § 2201 & 28 U.S.C. § 12133.

III. THE UNITED STATES DISTRICT COURTS, SOUTHERN
DISTRICT OF OHIO IN THE WESTERN DIVISION IS INFAT
THE APPROPRIATE VENUE UNDER 28 U.S.C. § 1331(b)(2)
DUE TO THE UNCONSTITUTIONAL TRANSPRESSIONS, EVENTS
AND OMISSIONS GIVING RISE TO THE CLAIMS TRANSPIRING
IN STATED COURTS VENUE OF LAW.

PLAINTIFF-PETITIONER
Jeremy P. Gallant A PRISONER WHO IS CURRENTLY
INCARCERATED WITHIN OHIO'S DEPARTMENT OF REHABILITATION
AND CORRECTIONS SOUTHERN OHIO CORRECTIONAL FACILITY-
(O.D.R.C.-S.O.C.F.) WHICH RESIDES IN THE SOUTHERN
DISTRICT OF OHIO, COME BEFORE THE HONORABLE COURTS
ON BEHALF OF A CLASS OF PRISONERS ALL MAKING
THE SAME CIVIL ASSERTIONS. THE FOLLOWING LISTED
PARTIES ARE TO BE LISTED AS PLAINTIFFS IN THE
CURRENT CIVIL AFFAIRS..

PLAINTIFF: Jeremy P. Gallant -
PLAINTIFF: STEVEN ROINES NO. 582-055 - PLAINTIFF-
LUCAS RUDDOCK NO. 612348 - PLAINTIFF: Gregory Pickens-
287-726 - PLAINTIFF TREVORON HUNTER 645-052 - PLAINT-
-10-F - WAITER PARK NO. 562-082 - PLAINTIFF LAWRENCE LITTLE
NO. 599-448 - + PLAINTIFFS Jon Does x 20 - +
PLAINTIFF DENNET S. SPRAGLE NO. 650-C40 (REFER TO LIST) -

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO 216
WESTERN DIVISION MARCH 3rd, 2018

DEFENDANTS IN THIS CIVIL CLASS ACTION COMPLAINT ARE THE FOLLOWING LISTED RESPONSIBLE PARTIES ABLE TO BE IDENTIFIED. PLAINTIFF RESPECTFULLY REQUEST THE HONORABLE COURTS ASSIGN DESIGNATED RESERVATIONS FOR 10 JEN/JANE DOE PARTIES AS FOR RESPONSIBLE, UNIDENTIFIABLE PERSONS TO BE LISTED AS DEFENDANTS.

1.) DEFENDANT - M.R. HOLDREN - S.O.C.C. SAFETY AND SANITATION DEPARTMENT - M.R. HOLDREN IS CHARGED WITH THE RESPONSIBILITY OF ENSURING THE OPERATIONS OF THIS FACILITY REMAIN IN COMPLIANCE WITH O.D.R.C. POLICY AND SAFETY/SANITATION SPECIFICATIONS. M.R. HOLDREN INTENTIONALLY FAILS TO UPHOLD THE ASSIGNED OBLIGATIONS BY BEING DELIBERATELY INDIFFERENT TO UNCONSTITUTIONAL CONDITIONS RESULTING IN THE VIOLATIONS OF PLAINTIFFS RIGHTS. I HUMBLY REQUEST THE HONORABLE COURTS HOLD M.R. HOLDREN ACCOUNTABLE FOR THE CONSTITUTIONAL VIOLATIONS/DEPRIVATIONS BY LISTING THIS PARTY AS A DEFENDANT IN CLASS ACTION CIVIL COMPLAINT BEFORE YOU.

2.) DEPUTY WARDEN OF OPERATIONS - M.R. COOL - THIS PARTY IS CHARGED WITH THE RESPONSIBILITY OF ENSURING THE OPERATIONS OF THIS FACILITY REMAIN IN COMPLETE COMPLIANCE WITH O.D.R.C. POLICY. M.R. COOL FAILS TO UPHOLD THESE OBLIGATIONS BY BEING DELIBERATELY INDIFFERENT TO THE UNCONSTITUTIONAL INFILTRATIONS. EVEN AFTER M.R. COOL WAS MADE CONSCIOUSLY AWARE OF SUCH CONSTITUTIONAL VIOLATIONS/DEPRIVATIONS M.R. COOL INTENTIONALLY DISREGARDS SUCH RENDERING M.R. COOL AS A ACCESSORY TO THE UNCONSTITUTIONAL TRANSGRESSIONS BY PERMITTING SUCH TO CONTINUE. I HUMBLY REQUEST THE HONORABLE COURTS HOLD M.R. COOL ACCOUNTABLE FOR THE CONSTITUTIONAL VIOLATIONS/DEPRIVATIONS BY LISTING THIS PARTY AS A DEFENDANT IN THE CLASS ACTION COMPLAINT.

3.) DEPUTY WARDEN OF SPECIAL SERVICES - M.R. CADOGAN - THIS PARTY IS CHARGED WITH THE RESPONSIBILITY OF ENSURING SERVICES WITHIN THIS FACILITY ARE PROVIDED IN COMPLIANCE WITH O.D.R.C. POLICY. M.R. CADOGAN FAILS TO UPHOLD HIS OBLIGATIONS BY BEING DELIBERATELY INDIFFERENT TO SUCH AFTER BEING MADE CONSCIOUSLY AWARE. I HUMBLY ASK THE HONORABLE COURTS TO HOLD M.R. CADOGAN ACCOUNTABLE FOR THE CONSTITUTIONAL VIOLATIONS/DEPRIVATIONS BY THE LISTING OF THIS PARTY AS A DEFENDANT IN THIS CLASS ACTION COMPLAINT.

4.) INSPECTOR MAHIMAN - M.R. MAHIMAN IS CHARGED WITH THE RESPONSIBILITY OF SUPERVISING AND MONITORING OPERATIONS OF THIS FACILITY'S 5120-9-31 CYREANCE PROCEDURES, WITH PRISONERS' COMPLAINTS - DUE TO INSPECTOR MAHIMAN'S CONTINUED DELIBERATE INDIFFERENCE THE CONSTITUTIONAL VIOLATIONS/DEPRIVATIONS DO TRANSPARE. INFAT, IT IS BECAUSE OF INSPECTOR MAHIMAN THAT THIS FACILITY CONTINUES IT'S UNCONSTITUTIONAL OPERATIONS. I HUMBLY REQUEST THE HONORABLE COURTS HOLD M.R. MAHIMAN ACCOUNTABLE AS A LISTED DEFENDANT...

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO 3/6
WESTERN DIVISION MARCH, 3rd, 2016

5.) JON / JANE DOES X 10 - I Humbly request the Honorable Courts assign Ten Jon/Jane Does in this Civil Class Action Complaint for unidentified parties to be listed as Defendants as their identities are made available...-

PLAINTIFF HAS INFACT LISTED ALL RESPONSIBLE PARTIES ABLE TO BE IDENTIFIED AS DEFENDANTS IN THIS MATTER AND HUMBLY ASK THE COURTS TO PERMIT THIS ACTION TO PROCEED ON. ALL DEFENDANTS ARE BEING HELD IN BOTH INDIVIDUAL AND OFFICIAL CAPACITIES FOR THE CIVIL ASSERTIONS.

ALL PLAINTIFF'S, TO THE BEST OF PETITIONER'S KNOWLEDGE, DID INFACT UTILIZE AND EXHAUST THE AVAILABLE STATE/ADMINISTRATIVE REMEDIES AS FEDERALLY REQUIRED... BEFORE SEEKING RELIEF WITH IN THIS COURT...

THIS CIVIL CLASS ACTION COMPLAINT INVOLVES VIOLATIONS - DEPRIVATIONS OF LISTED PLAINTIFF'S CONSTITUTIONAL RIGHTS, WITH REGARDS TO CONDITIONS OF CONFINEMENT AND A PARTICULAR INCIDENT THAT TRANSPRIRED ON FEBRUARY 13TH, 2016 WITHIN THE SOUTHERN OHIO CORRECTIONAL FACILITY - (S.O.C.F.) - SUCH UNCONSTITUTIONAL TRANSGRESSIONS WERE INFACT INFILCTED UPON LISTED PLAINTIFF'S AND A NUMBER OF OTHER PRISONERS. PLAINTIFF NOW BEGINS COMPLAINT DESCRIPTIONS FOR WHICH GIVE RISE TO THE CIVIL CLASS ACTION COMPLAINT.-

1.) ON FEBRUARY 13TH, 2016 WITHIN S.O.C.F.'S HOUSING UNIT J-21, AT OR AROUND FOUR O'CLOCK IN THE MORNING THE LIVING QUARTERS MAIN SEWAGE LINE WAS DISCOVERED TO BE CONGESTED RESULTING IN A SIGNIFICANT AMOUNT OF BIO-HAZARD CONTAMINATES AND RAW SEWAGE TO POUR OUT OF THE SHOWER DRAINS AND PRISONERS TOILETS.

2.) S.O.C.F.'S J-21 HOUSING UNIT CONTAINS ABSOLUTELY NO FORM OF PRECAUTIONARY MEASURES, WITH REGARDS TO SEWAGE OVER-FLOW AND BACK-UP DRAINAGE SYSTEMS.

3.) THE J-21 HOUSING UNIT IS RESIDENCE TO A MAXIMUM CAPACITY OF 80 PRISONERS WHICH ALL SHARE ONE MAIN SEWAGE DRAIN FOR EACH OF THE 80 CELL'S SINKS AND TOILETS.

4.) THE FEBRUARY 13TH 2016, 2:00 A.M. DISCOVERY OF BIO-HAZARD CONTAMINATES AND RAW SEWAGE OVER-FLOW WAS INFACT PERMITTED TO CONTINUE ON RESULTING IN 911 OF THE J-21 PRISONER'S FECAL, URINE, AND EXCREMENT DISPOSALS FLOODING ONTO THE LIVING QUARTERS RESIDENCE..

5.) THE J-21 HOUSING UNIT'S SEWAGE OVER-FLOW WAS INFACT PERMITTED TO CONTINUE A GOOD PORTION OF THE DAY FROM ABOUT 4 A.M. TO AROUND 6-2:00 P.M.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO ²¹⁶
WESTERN DIVISION

MARCH, 3rd, 2016

6) BETWEEN THESE TIMES BIO-HAZARD CONTAMINATES RAW SEWAGE, FECAL MATTER AND UNKNOWN PARTICLES FLOWED FREELY, COMPLETELY SUBMERGING THE ENTIRE J-2 LIVING QUARTERS IN TOXIC LIQUIDS AND SUBJECTING THE PRISONERS TO IMPENDING DANGERS OF SERIOUS PHYSICAL HARM BY EXPOSURES TO POSSIBLE CONTRACTIONS OF INFECTIOUS DISEASE.

7.) DUE TO THE DEFENDANTS AND RESPONSIBLE STATE OFFICIALS DELIBERATE INDIFFERENCE AND LACK OF ACTIONS, RESPONSE, AND PRECAUTIONARY MEASURES THE J-2 PRISONERS WERE FORCED TO RESIDE IN SUCH CRUEL, DISGUSTINGLY FILTHY, INHUMANE CONDITIONS FOR ABOUT 06 HOURS.

8.) FURTHERMORE, ON FEBRUARY 03RD, 2016, WITHIN S.O.C.F.'S HOUSING UNIT J-2, THE PRISONER AND LISTED PLAINTIFFS WERE FORCED TO CONSUME 9/11 3 OMEALS WHILE RESIDING IN STANDING RAW SEWAGE AND BIO-HAZARD CONTAMINATES, WHICH ALSO PLACED THE PRISONERS AT GRAVE RISK AND DANGER!.

9.) EVEN AFTER THE J-2 HOUSING UNITS CONGESTED SEWAGE LINE WAS CLEARED, PLAINTIFFS - PRISONERS WERE STILL INHUMANELY FORCED TO RESIDE IN STANDING SEWAGE AND BIO-HAZARD CONTAMINATES.

10.) ABSOLUTELY NO PROVISIONS WERE SUPPLIED TO THE PLAINTIFFS TO COMBAT THE STANDING SEWAGE, CLEAN THE CONTAMINATES, REPLACE THE POSSESSIONS AND CLOTHING EXPOSED, NOR WERE ANY SHOWERS OFFERED TO THE PRISONERS FOR DECONTAMINATION PURPOSES, WHICH IN AND OF ITSELF IS A VIOLATION OF PLAINTIFFS RIGHTS..

11.) FURTHERMORE, S.O.C.F. STATE OFFICIALS, IN PARTICULAR, THE MEDICAL DEPARTMENT, FAILED TO ACT ACCORDINGLY IN THE MATTER, NEVER DISPATCHING ANY FORM OF PROPER MEDICAL NOR TESTING, AS REQUIRED WHEN A INDIVIDUAL IS EXPOSED TO BIO-HAZARDOUS CONTAMINATES.. THIS AS WELL CONSTITUTES FURTHER DELIBERATE INDIFFERENCE AND CONSTITUTIONAL VIOLATIONS/DEPRIVATIONS. -

12.) IN ATTEMPTS TO JUSTIFY THE CRUEL, INHUMANE, UNCONSTITUTIONAL INFILCTIONS, IT WAS STATED THAT THE J-2 PRISONERS INTENTIONALLY FLOODED THE LIVING QUARTERS, WHICH IS A COMPLETE FABRICATION.

13.) THE FEBRUARY 03RD, 2016 "SATURDAY SEWAGE SPILL" INCIDENT IS A FACTUAL ASSERTION WHICH WAS ALL CAPTURED AND RECORDED ON VIDEO RECORDINGS, AND IS UNDISPUTED BY SURVEILLANCE.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO S16
- WESTERN DIVISION -

MARCH, 3rd, 2006

PLAINTIFF- PETITIONER WOULD LIKE TO RESERVE THE
 RIGHT TO AMEND THIS SECTION OF COMPLAINT AFTER
 SECURING DECLARATIONS FROM WITNESSING PARTIES AND
 LISTED DEFENDANTS...

CONDITIONS OF CONFINEMENT

PLAINTIFF- PETITIONER ALSO RAISE UNCONSTITUTIONAL
 CONDITIONS OF CONFINEMENT WITHIN S.O.C.F. ON BEHALF
 OF PRISONERS WHOM ARE FORCED TO RESIDE...

1.) FIRE SAFETY VIOLATIONS- S.O.C.F.'S HOUSING UNITS CELLS
 LACK ALL FIRE SAFETY MODIFICATIONS AND FURNISHINGS
 IN VIOLATION OF THE STATE'S FIRE MARSHALL'S MANDATES.
 THIS LACK OF FIRE PRECAUTIONS IS IN DIRECT VIOLATION
 OF PRISONERS CONSTITUTIONAL RIGHTS, WITH LISTED DEF-
 ENDANTS AND RESPONSIBLE STATE OFFICIALS CONTINUED
 DELIBERATE INDIFFERENCE AND INTENTIONAL DISREGARD
 SUBJECTING PLAINTIFFS TO IMPENDING DANGERS, WITH PLACE-
 MENT FOR POTENTIAL DARM SERIOUS INJURY AND POSSIBLE
 DEATH., IN THE EVENT OF A FIRE. DEFENDANTS CONTINUE
 TO SUBJECT PRISONERS TO THESE UNCONSTITUTIONAL CONDI-
 TIONS IN VIOLATION OF PLAINTIFFS RIGHTS..

2.) IMPROPER/INADEQUATE AIR VENTILATIONS - POOR AIR
 QUALITIES- DEFENDANTS AND RESPONSIBLE STATE OFFICIALS
 CONTINUE TO BE DELIBERATELY INDIFFERENT TO PRISONERS
 QUALITY OF AIR, BY INTENTIONALLY DISREGARDING THE S.O.C.F.
 HOUSING UNITS IMPROPER-INADEQUATE AND NON-FUNCTIONING
 AIR VENTILATIONS. THIS CONSTITUTIONAL INFRINGEMENT
 RESULTS IN POOR AIR QUALITY, EXPOSING THE PRISONERS
 AND PLAINTIFFS TO POSSIBLE CONTRACTION OF MIXED DUST
 DISEASE BY FORCING THE POPULATION TO BREATHE IN POLLUTED
 AIR PARTICLES. DEFENDANTS AND STATE OFFICIALS CON-
 TINUE TO CONSCIOUSLY DISREGARD SUCH AIR POLLUTIONS BY
 FAILING TO ENSURE PROPER AIR VENTILATIONS WHICH IS IN
 VIOLATION OF PLAINTIFFS CONSTITUTIONAL RIGHTS..

3.) NOISE DECIBELS- DANGEROUSLY HIGH & EXCEEDING LEVELS
 OF NOISE DECIBELS. LISTED DEFENDANTS AND RESPONSIBLE
 STATE OFFICIALS CONTINUE TO BE DELIBERATELY INDIFFER-
 ENT TO S.O.C.F.'S HOUSING UNITS DANGEROUSLY HIGH AND
 EXCEEDING LEVELS OF NOISE DECIBELS BY REFUSING TO TAKE
 NECESSARY MEASURES TO COMBAT THE UNCONSTITUTIONAL
 INFILTRATIONS.. LISTED DEFENDANTS AND RESPONSIBLE STATE
 OFFICIALS COMPLETELY DISREGARD SUCH FACTOR IN DIRECT
 VIOLATION OF PLAINTIFFS CONSTITUTIONAL RIGHTS..

4.) SOLITARY CONFINEMENT- THE DURATIONS AND MEANS OF
 IMPLEMENTING SOLITARY CONFINEMENT ARE GROSSLY INHUMANE
 AND UNCONSTITUTIONAL IN VIOLATIONS OF PRISONERS
 CONSTITUTIONAL RIGHTS. PLAINTIFF- PETITIONER WOULD
 OBVIOUSLY REQUEST TO AMEND THIS SECTION OF COMPLAINT
 AT A LATER TIME FOR PROPER ASSERTIONS TO BE MADE..

United States District Court
Southern District of Ohio ⁶¹⁶
PROTESTANT DIVISION ^{March, 3rd, 2016}
Justifications For Cause Of Action

PLAINTIFFS LISTED WITHIN THIS CLASS ACTION CIVIL COMPLAINT ARE INFACT ENTITIED TO PROCEED IN COURTS ADJUDICATIONS AS OF MATTER OF CONSTITUTIONAL LAW. ALL PLAINTIFFS ARE AMERICAN CITIZENS AND SUFFERED THE CONSTITUTIONAL VIOLATIONS - DEPRIVATIONS AS ASSERTED IN COMPLAINT TRANSCRIPTIONS. LISTED DEFENDANTS AND UNIDENTIFIABLE STATE OFFICIALS, DID INFACT COMMIT VIOLATIONS OF PLAINTIFFS CONSTITUTIONAL RIGHTS BY EITHER PERSONAL PARTICIPATIONS, OR INTENTIONAL FAILURES TO CEASE THE TRANSGRESSIONS. PLAINTIFFS, BY LISTED DEFENDANTS UNCONSTITUTIONAL INFILCTIONS, SUFFER FROM VIOLATIONS & DEPRIVATIONS OF THEIR 8TH AMENDMENT RIGHTS TO BE FREE FROM CRUEL AND UNUSUAL PUNISHMENT BY BEING FORCEFULLY SUBJECTED TO GROSSLY INHUMANE CONDITIONS IN DANGEROUS FASHIONS. PLAINTIFFS IN CIVIL COMPLAINT RESPECTFULLY REQUEST THE HONORABLE COURTS INTERPRET THE UNCONSTITUTIONAL TRANSGRESSIONS AS THEY ARE TO BE., WITH RIGHTFULL ORDER MADE..

PRAAYER FOR ENTITIED RELIEF

THEREFORE, ALL PLAINTIFFS LISTED IN THIS CIVIL CASE, HUMBLY REQUEST THE HONORABLE COURTS:

- A.) DECLARE THAT THE ACTS AND OMISSIONS DESCRIBED WITHIN THESE CIVIL ASSERTIONS VIOLATE PLAINTIFFS RIGHTS UNDER THE CONSTITUTION AND LAWS OF THE UNITED STATES OF AMERICA...
- B.) ORDER DEFENDANTS TO PAY COMPENSATORY AND PUNITIVE DAMAGES TO EACH OF THE PLAINTIFFS.
- C.) ORDER DEFENDANTS TO PAY REASONABLE ATTORNEY FEES AND OF COUR COST.
- D.) GRANT ANY OTHER JUST AND EQUITABLE RELIEF THAT THIS HONORABLE COURT MAY DEEM NECESSARY.

RESPECTFULLY SUBMITTED -
(ON BEHALF OF PLAINTIFFS)

Jeremy P. Gallant
JEREMY P. GALLANT
NO. 624283- S.O.C.F.
P.O. Box 215699

LUCASVILLE, OH 45698

I, JEREMY P. GALLANT, PURSUANT TO 28 U.S.C. § 1746, DO DECLARE AND VERIFY UNDER PAINS & PENALTIES OF PERJURY AND UNDER THE LAWS OF THE UNITED STATES OF AMERICA, THAT THE FOREGOING TRANSCRIPTIONS ARE TRUE, CORRECT, AND EXACT RECITINGS TO THE BEST OF MY KNOWLEDGE. THIS I SWEAR TO AND AFFIRM IN A COURT OF LAW. * EXECUTED MARCH 3RD, 2016 *